

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

DOCKET NUMBER

05 11011-MLW

MARJORIE HYPPOLITE,
PLAINTIFF

V.

ELECTRONIC DATA SYSTEMS
CORPORATION
DEFENDANT

PLAINTIFF'S INITIAL VOLUNTARY DISCLOSURE

The Plaintiff, pursuant to Fed.R.Civ.P.26 (a)(1), Local Rule 26.2, and Expense and Delay Reduction Plan Rule 2.02, hereby makes her initial disclosures in the above captioned matter. All disclosures herein are made without waiving any applicable objections, including but not limited to relevance, undue burden, privilege, attorney-client privilege, and work product doctrines. The identification herein of documents and individuals is made without waiving objections as to the admissibility of any such document or individual's testimony.

I. Individuals Likely To Have Discoverable Information Relevant To Disputed Facts Alleged With Particularity.

1. Plaintiff names all of the parties named in the Complaint as persons likely to have discoverable information.
2. Plaintiff adopts by reference those individuals identified in the Defendants' First Voluntary Disclosures filed in reference to the Complaint.

Keeper of Records for the Electronic Data Systems Corporation;

Any individuals identified in the Defendants' initial voluntary disclosures.

II. Documents Currently In The Possession, Custody, or Control Of Plaintiff That Are Likely To Be Relevant To Disputed Facts Alleged With Particularity.

Personnel file of Plaintiff from Electronic Data Systems Corporation

III. Damages - Plaintiff claims damages in the amount of \$125,000.00 including past and future medical bills, disability, lost wages and earning capacity, and mental pain and suffering.

IV. Other Documents

Plaintiff is not in the possession, custody, or control of any: a) insurance agreements which would indemnify any judgment entered in this action; b) any expert reports; c) investigative reports d) any contracts entered into between parties to this action except as follows:

1. Personnel file of Plaintiff from Electronic Data Systems Corporation.

By Plaintiff's Attorney,



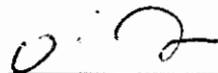
David Green, Esquire
ALFORD & BERTRAND, L.L.C.
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P.O. Box 322
Watertown, MA 02471-0322
(617) 926-8800

CERTIFICATE OF SERVICE

I, David Green, Esquire, hereby certify that a copy of the foregoing has been served upon Defendant's attorneys, by sending same via facsimile to the following this 8th day of September, 2005.

Kelly King, Esq.
Baker & Hostetler
3200 National City Center
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**Offices in Watertown
Mattapan, Quincy & Lynn**

September 8, 2005

Maria Simeone
Clerk to Magistrate Judge Leo T. Sorokin
United States District Court
John Joseph Moakley United States Courthouse
1 Courthouse Way
Boston, MA 02210

RE: Hyppolite v. Electronic Data Systems Corp.
Docket No: 05 11011-MLW

Dear Clerk Simeone:

Enclosed please find:

Plaintiff's Initial Voluntary Disclosure.

Please file in your usual manner. Thank you for your cooperation and attention in this matter.

Sincerely,

ALFORD & BERTRAND, LLC


DAVID GREEN, ESQUIRE

enclosure

cc: Kelly King, Esq.

Leah Miriam Moore, Esq.